

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

ANN ALTMAN,

Plaintiff,

v.

SAMUEL ALTMAN,

Defendant.

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No. 4:25-cv-00017-SEP

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND  
PLEADING AND BRIEFING DEADLINES**

COMES NOW Plaintiff, Ann Altman, by and through her attorneys, Mahoney Law Firm, LLC, and moves for an extension of additional time, up to and including April 23, 2025, to respond to Defendant’s Motion to Dismiss and Counterclaims. In support thereof, Plaintiff states as follows:

1. Plaintiff filed her Complaint on January 6, 2025 [Dkt. No. 1];
2. Defendant waived service on January 7, 2025, which established a deadline to file an answer or dispositive motion no later than March 7, 20025 [Dkt. No. 6];
3. On March 7, 2025, Defendant filed a Motion to Dismiss [Dkt. No. 16];
4. On that same date, Defendant filed his Answer to the Complaint and Counterclaims against Plaintiff [Dkt. No. 18];
5. The Court’s briefing schedule directs that Plaintiff respond to Defendant’s motion to dismiss within 14 days, or no later than March 24, 2025 under Fed. R. Civ. P. 6(a)(1).
6. Fed. R. Civ. P. 6(b) dictates that this Court may, for good cause, extend the time for a party to respond. “‘The primary measure of good cause is the movant's diligence’ in

attempting to meet deadlines.” *Albright ex rel. Doe v. Mountain Home Sch. Dist.*, 926 F.3d 942, 951 (8th Cir. 2019) (quoting *Rahn v. Hawkins*, 464 F.3d 813, 822 (8th Cir. 2006)).

7. Plaintiff seeks additional time to investigate the allegations and claims in Defendant’s Counterclaims and Motion to Dismiss. Plaintiff’s Counsel is also currently set to begin a jury trial on March 31, 2025, that requires significant preparation and pre-trial motion practice.

8. Plaintiff does not seek this extension for any improper purpose or delay, and the requested extension will not impact any existing deadlines, as there is no scheduling order or trial date set in this matter.

9. Defendant’s counsel has no objection to Plaintiff’s requested extension.

WHEREFORE Plaintiff, Ann Altman, requests that this Court issue an Order extending the time to respond to Defendant’s Motion to Dismiss and Counterclaims [Dkt. Nos. 16 & 18], up to and including April 23, 2025, and for such other relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

By: /s/ Ryan J. Mahoney

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***Attorneys for Plaintiff***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 14, 2025, a copy of the foregoing document was electronically filed with the United States District Court for the Eastern District of Missouri, and that copies were electronically sent to all counsel of record.

/s/ Angie Rucker